

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KATHY POLIAN	:	VIOLATIONS: 21 U.S.C. § 846
EDWARD KLOTZ	:	(Conspiracy to possess
JANICE CAMPANELLA	:	with intent to distribute
	:	methamphetamine - 1
	:	count)
	:	21 U.S.C. §841(a)(1)
	:	(Possession of
	:	methamphetamine with
	:	intent to distribute
	:	- 1 count)
	:	21 U.S.C. §846
	:	(Attempt to distribute
	:	methamphetamine- 1
	:	count)
	:	21 U.S.C. § 853
	:	(Criminal Forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between at least in or about April 2002 and on or about September 29, 2003, at
Freemansburg, Northampton County, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**KATHY POLIAN
EDWARD KLOTZ
and
JANICE CAMPANELLA**

did conspire and agree together and with other persons known and unknown to the grand jury to knowingly and intentionally possess with intent to distribute in excess of 500 grams of a mixture or substance containing a detectable amount of methamphetamine and in excess of five grams of methamphetamine (actual), Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841 (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

1. Defendant KATHY POLIAN agreed to supply defendants EDWARD KLOTZ and JANICE CAMPANELLA with methamphetamine.
2. Defendants EDWARD KLOTZ and JANICE CAMPANELLA sent United States currency via Federal Express to defendant KATHY POLIAN in California for the purchase of methamphetamine.
3. Defendant KATHY POLIAN obtained methamphetamine in California, secreted the methamphetamine within wax candles, and shipped the candles via Federal Express from California to the defendants EDWARD KLOTZ and JANICE CAMPANELLA in Freemansburg and Hellertown, Northampton County, Pennsylvania.
4. Defendants EDWARD KLOTZ and JANICE CAMPANELLA received the methamphetamine shipped by defendant KATHY POLIAN and distributed the methamphetamine to other persons.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or about April 2002, defendant EDWARD KLOTZ met with defendant KATHY POLIAN in California to discuss the purchase of methamphetamine from POLIAN.

2. Between April 2002 and September 2003, defendant KATHY POLIAN shipped to defendants EDWARD KLOTZ and JANICE CAMPANELLA on multiple occasions, via Federal Express, parcels containing methamphetamine secreted within candles.

3. Between April 2002 and September 2003, defendants EDWARD KLOTZ and JANICE CAMPANELLA sent United States currency by Federal Express to defendant KATHY POLIAN in California for the purchase of methamphetamine.

4. On or about June 9, 2003, defendant KATHY POLIAN took a parcel containing approximately 78.3 grams of methamphetamine, gross weight, to a Federal Express Office in Clovis, California, for shipment to defendants EDWARD KLOTZ and JANICE CAMPANELLA at CAMPANELLA'S residence in Hellertown, Northampton County.

5. On or about September 27, 2003, defendant KATHY POLIAN took a parcel containing approximately 36.7 grams of d-methamphetamine hydrochloride, net weight, to a Federal Express Office in Clovis, California, for shipment to defendants EDWARD KLOTZ and JANICE CAMPANELLA at KLOTZ' residence in Freemansburg, Northampton County.

6. On or about September 29, 2003, defendant EDWARD KLOTZ received the Federal Express parcel containing the methamphetamine shipped by defendant KATHY POLIAN from California.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 29, 2003, at Freemansburg, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**KATHY POLIAN
EDWARD KLOTZ
and
JANICE CAMPANELLA**

did knowingly and intentionally possess with intent to distribute, and aid and abet the possession with intent to distribute of, in excess of five grams, that is, approximately 36.7 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841 (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 20, 2003, at Bethlehem, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, defendant

KATHY POLIAN

did knowingly and intentionally attempt to distribute in excess of five grams, that is, approximately 70.6 grams, of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841 (a) (1) and 841 (b) (1) (B).

NOTICE OF FORFEITURE

1. As a result of the violation of Title 21, United States Code, Sections 846 and 841, set forth in counts One through Three of this indictment, the defendant

**KATHY POLIAN
EDWARD KLOTZ
JANICE CAMPANELLA**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 21, United States Code, as charged in this indictment, including;

(b) any property constituting, or derived from, proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this indictment; and

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853 (a)(1), (a)(2), and (p)

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney